



March 13, 2019

SUBMITTED VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: Request for Review and/or Waiver, CC Docket No. 02-6

Dear Ms. Dortch:

On behalf Catholic School Region of Northeast & East Bronx (BEN 17000730) (“Applicant” or School”), eRate Program, LLC, consultant for the applicant, files this request for review and/or waiver of USAC’s denial of payment for services rendered for the Santa Maria School (BEN 10620) for FY2016 Application # 161056131.¹ Specifically, the School requests that the Commission direct USAC to process the FY2016 Form 474 Invoice that was timely submitted and, to the extent required, issue a waiver for any missed deadlines that resulted from USAC’s error.

Background

Catholic School Region of Northeast & East Bronx sought Category Two non-recurring funding for Santa Maria School under Funding Request Number (FRN) 1699130540. USAC issued a Funding Commitment Decision Letter on September 26, 2016, approving the funding in the amount of \$56,249.00, setting the last date of service as September 30, 2017. The approved E-rate requested discount amount was \$44,999.20. The service provider, RC Technology Services, Inc. (RC Technology), provided the services in a timely fashion.

The School sought a timely invoice extension deadline request for non-recurring services, which was approved and USAC set the new invoicing deadline to May 29, 2018 as set forth below.²

¹ See FCC Form 471, Exhibit 1.



From: no-reply@solixinc.com <no-reply@solixinc.com>
Sent: Monday, October 30, 2017 3:03 PM
To: ERP <erp@erateprogram.com>
Subject: Invoice Deadline Extension Request for 1699130450 was approved

Since this serves as approval, an invoice requesting payment must be submitted so that it is postmarked no later than the date found on the USAC website within the Search Tools in order for your request to be considered as timely filed. Your new deadline is: 5/29/2018

Having completed the services by September 30, 2017, as required for non-recurring services, on November 8, 2017, RC Technology invoiced the School for its non-discounted share of \$11,249.80 for Santa Maria School's Category 2 FRN 1699130540.³ In turn, the School paid this amount on March 14, 2018.⁴

Also, compliant with the new invoicing deadline of May 29, 2018, on April 5, 2018, RC Technology submitted its FCC Form 474 to USAC seeking the discounted amount of \$44,999.20.⁵ Although submitted well within the invoice deadline extension date of May 29, 2018, this invoice was never paid.

Unclear of the path forward, RC Technology reached out to USAC. After waiting months with no word, in December 2018, under Case #257485, USAC informed the service provider that the invoice was denied, because the service provider invoiced the customer on November 1, 2017, which was after the service delivery deadline of date (September 30, 2017), so the invoice was denied on April 9, 2018.⁶ The service provider did not receive the April 9, 2018 notice. When the service provider spoke to the Customer Service Bureau Representative, she was told that the USAC invoice team was going through a type of internal reorganization and change in invoicing teams and processes and that she would now need to resubmit the documentation again. Specifically, the USAC Representative stated that "[a]t this point there is nothing [to] be done unless the applicant is somehow able to get an extension for the service delivery and invoice deadline dates."⁷ Being new to the E-rate Program and perplexed as to why a service delivery extension request would be necessary given that the services were provided by

² 47 CFR § 54.514 (a) and (b).

³ Copy of Invoice from RC Technology, Exhibit 2.

⁴ Copy of School's Cancelled Check for Non-Discounted Share, Exhibit 3.

⁵ RC Technology FY 2016 Form 474 Submission, Exhibit 4.

⁶ USAC Response, dated Dec. 6, 2018, Exhibit 5.

⁷ Exhibit 5.



September 30, 2017, the service provider forwarded this information to the consultant for the School.

In December 2018, out of an abundance of caution, the Applicant filed a contract extension, and a service delivery deadline extension. It did not believe that it needed to file this Request for Review or Waiver until a contract extension was approved. The contract extension was approved on January 17, 2019 and the contract was extended until April 30, 2019.⁸ The Revised Funding Commitment Decision Letter (RFCDL) identified the original and revised funding commitment to be \$44,999.20.

Around the same time period, in attempt to try again, on January 4, 2019, RC Technology resubmitted its FCC Form 474 invoice request.⁹ On January 8, 2019, USAC denied the invoice, because it was after the May 29, 2018 date to invoice and the billed invoice date was later than the service delivery date.¹⁰ USAC also referenced error codes, some of which do not exist on USAC's website and are neither clear to the School or RC Technology.¹¹

Given that the contract extension was approved on January 17, 2019, and USAC issued a new RFCDL, the Applicant is filing this Request for Review and/or Waiver within 60 days, seeking the assistance of the Commission in resolving this issue.

Discussion

Catholic School Region of Northeast & East Bronx is at a loss as to the length of time committed to and confusion surrounding this matter. It believes that it has followed all of the requirements and that its service provider has also correctly met the invoicing requirements within the deadline established by USAC through the following actions: (1) the non-recurring services were awarded through a competitive bid process, (2) the School filed a timely FCC Form 471, (3) the service provider provided the services on a timely basis, (4) the School submitted a timely invoice deadline extension request, (5) the service provider timely billed the School, (6) the School paid the vendor for its non-discounted share, and (7) the service provider properly and timely billed USAC. For reasons that remain completely unknown to both the School and RC Technology, USAC has not paid the \$44,999.20.

The School recognizes that USAC went through a difficult EPC transition in FY2016 and beyond, which compromised the information below. It also recognizes that the USAC had many internal invoicing issues during this same time period related to changes in personnel and the rollout of new invoicing processes. Moreover, it is very difficult to appeal matters without a

⁸ RFCDL, dated Jan. 17, 2019, Exhibit 6.

⁹ Resubmitted FY2016 Form 474 Invoice, dated Jan. 4, 2019, Exhibit 7.

¹⁰ Invoice Denial, dated Jan. 8, 2019, Exhibit 8.

¹¹ USAC Error Codes, Exhibit 9.



clear understanding of the reason for denial based on rules and policy when there are so many internal issues within USAC and the EPC rollout, as well as between different divisions within the Schools and Libraries Division (SLD) that are approving extensions, but not invoices, and being handled by USAC employees who may not understand how all of these rules and requests for extensions intersect and co-exist with each other.

FCC rules allow the service provider to invoice within 120 days of the last date of service.¹² The last date to invoice and request a deadline extension for FY2016 non-recurring services was January 29, 2018.¹³ RC Technology provided the services by September 30, 2017 and, thereafter, invoiced the School its one-time charge on a timely basis on November 1, 2017, well within the 120-day invoice period. USAC erred in its finding.

Equally, the FCC rules mandate that USAC provide for a one-time, automatic 120-day invoice extension if requested prior to the initial 120-day deadline. As noted above, the deadline for FY2016 non-recurring services was January 29, 2018. The School sought the extension in October, 2017, well in advance of that deadline and USAC approved it on October 30, 2017 and correctly set the date for May 29, 2018. RC Technology correctly and timely submitted its FCC Form 474 invoice to USAC on April 5, 2018. It still remains unclear why USAC failed to process and pay the invoice and what Code 81 on invoicing errors really means.

Request for Waiver

The Catholic School Region of Northeast & East Bronx believes that it is filing this appeal on a timely basis based upon the RFCDL that was issued on January 17, 2019. However, to the extent that the Commission finds that a waiver is required, the School respectfully requests that it be granted.

The Commission has often waived its rules for such ministerial, clerical, and procedural errors and may do so on a motion for good cause.¹⁴ A rule may be waived where the particular facts make strict compliance inconsistent with the public interest.¹⁵ In addition, the Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.¹⁶ In sum, waiver is appropriate if special circumstances warrant a deviation from the general rule, and such deviation would better serve the public

¹² 47 CFR § 54.514(a) and (b).

¹³ USAC Schools and Libraries Newsbrief, dated January 4, 2019, Exhibit 10.

¹⁴ 47 C.F.R. §1.3.

¹⁵ *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (*Northeast Cellular*).

¹⁶ *WAIT Radio v. FCC*, 418 F.2d 1153, 1157, (D.C. Cir. 1969), *affirmed by WAIT Radio v. FCC*, 459 F.2d 1203 (D.C. Cir. 1972), *cert. denied*, 409 U.S. 1027 (1972).



interest than strict adherence to the general rule.¹⁷ Furthermore, the Commission has found that a waiver is appropriate when it would not have been necessary but for an error by USAC.¹⁸

Both the facts and circumstances set forth above indicate that a waiver of the invoice or appeal deadline are both in the interest of fairness and equity. The School and service provider followed the rules and deadlines and made great efforts to clearly understand why this FRN was being denied. But for the fact that USAC denied the timely filed FY2016 Form 474 invoice and the service provider never received any information from USAC setting forth the reason of denial until December 2018, this invoice should have been processed as timely. However, USAC instructed that the only way to possibly resurrect the FY2016 Form 474 invoice submission was through filing an invoice deadline extension and service delivery extension. In addition, another Form 500 was required for a contract extension. Outside of the error code message provided by USAC invoicing on January 8, 2019, the only documentation that the applicant received was this RFCDL, dated January 17, 2019, indicating that the revised commitment remained at \$44,290.20.

Conclusion

In sum, Catholic School Region of Northeast & East Bronx respectfully requests the FCC to direct USAC to process the invoice that was timely submitted on April 5, 2018 by RC Technology. In the alternative, to the extent that the Commission finds that a waiver for either the invoice deadline extension or the appeal deadline is required, the Applicant respectfully requests that it be granted such a waiver(s).

Respectfully,

Richard H. Senturia
CEO | eRate Program, LLC

¹⁷ *Northeast Cellular*, 897 F.2d at 1166.

¹⁸ *Schools and Libraries Universal Service Support Mechanism, Requests for Review and/or Requests for Waiver of Decisions of the Universal Service Administrator by Animas School District 6 et al.*; CC Docket No. 02-6, Order, DA 11-2040, 26 FCC Rcd 16903 (Wir. Comp. Bur. 2011), at ¶ 4 (granting waivers of the appeal filing deadline to eleven petitioners where their late-filed appeal would never have been necessary absent an error on the part of USAC).

EXHIBIT 1



Description of Services Ordered and Certification Form 471

FCC Form 471

Application Information

Nickname FY16 - 471 C2 - CATHOLIC SCHOOL REGION OF NORTHEAST & EAST BRONX 17000730
Application Number 161056131
Funding Year 2016
Category of Service Category 2

Billed Entity

CATHOLIC SCHOOL REGION OF NORTHEAST & EAST BRONX
2962 HARDING AVENUE SUITE 401 SUITE 401 N Y 10465
718-667-5350
neebronx-epc@archny.org

Contact Information

Richard A Senturia
314-282-3665
rsenturia@erateprogram.com

Billed Entity Number 17000730
FCC Registration Number 0025369190
Applicant Type School District

Consulting Firms

Name	Consultant Registration Number	City	State	Zip Code	Phone Number	Email
ERateProgram, LLC	16048902	St. Louis	MO	63132	314-282-3665	rsenturia@erateprogram.com

Entity Information

School District Entity - Details

BEN	Name	Urban/Rural	State LEA ID	State School ID	NCES Code	School District Attributes	Endowment
17000730	CATHOLIC SCHOOL REGION OF NORTHEAST & EAST BRONX	Urban				Private School District	None

Related Entity Information

Related Child School Entity - Details

BEN	Name	Urban/Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
10676	NATIVITY OF BLESSED LADY SCH	Urban				Survey	Private School	None
10671	OUR LADY OF GRACE SCHOOL	Urban				Survey	Private School	None

BEN	Name	Urban/ Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
10620	SANTA MARIA SCHOOL	Urban				Survey	Private School	None
10715	SS PHILIP AND JAMES SCHOOL	Urban				Survey	Private School	None
10652	ST BENEDICT SCHOOL	Urban				Survey	Private School	None
10594	ST CLARE'S SCHOOL	Urban				Survey	Private School	None
10660	ST FRANCIS ASSISI SCHOOL	Urban				Survey	Private School	None
10595	ST FRANCIS XAVIER SCHOOL	Urban				Survey	Private School	None
10668	ST MARY SCHOOL	Urban				Survey	Private School	None
10696	ST LUCY'S SCHOOL	Urban				Survey	Private School	None
10658	ST FRANCES DE CHANTAL SCHOOL	Urban				Survey	Private School	None
10757	HOLY FAMILY SCHOOL	Urban				Survey	Private School	None
10691	IMMACULATE CONCEPTION G SCHOOL	Urban				Survey	Private School	None
10725	HOLY ROSARY SCHOOL	Urban				Survey	Private School	None

Related Child School Entity - Discount Rate Calculation Details

BEN	Name	Urban/ Rural	Number of Students	Students Count Based on Estimate	CEP Percentage
10676	NATIVITY OF BLESSED LADY SCH	Urban	220	N/A	
10671	OUR LADY OF GRACE SCHOOL	Urban	310	N/A	
10620	SANTA MARIA SCHOOL	Urban	461	N/A	
10715	SS PHILIP AND JAMES SCHOOL	Urban	211	N/A	
10652	ST BENEDICT SCHOOL	Urban	284	N/A	
10594	ST CLARE'S SCHOOL	Urban	448	N/A	
10660	ST FRANCIS ASSISI SCHOOL	Urban	359	N/A	
10595	ST FRANCIS XAVIER SCHOOL	Urban	333	N/A	
10668	ST MARY SCHOOL	Urban	224	N/A	
10696	ST LUCY'S SCHOOL	Urban	513	N/A	
10658	ST FRANCES DE CHANTAL SCHOOL	Urban	310	N/A	
10757	HOLY FAMILY SCHOOL	Urban	266	N/A	
10691	IMMACULATE CONCEPTION G SCHOOL	Urban	299	N/A	
10725	HOLY ROSARY SCHOOL	Urban	395	N/A	

Discount Rate

School District Enrollment	School District NSLP Count	School District NSLP Percentage	School District Urban/ Rural Status	Category One Discount Rate	Category Two Discount Rate	Voice Discount Rate
4633	2538	55.0%	Urban	80%	80%	40%

Funding Request for FRN #1699130171

Funding Request Nickname: Knight Nets - Holy Rosary

Service Type: Internal Connections

BEN	Name	Amount
10696	ST LUCY'S SCHOOL	\$356.25

FRN Calculation for FRN #1699130321

Monthly Charges	
Total Monthly Recurring Charges	\$0.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$0.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$0.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$0.00
Total Eligible Pre-Discount One-Time Charges	+ \$41,217.89
Total Pre-Discount Charges	= \$41,217.89
Discount Rate	80%
Funding Commitment Request	= \$32,974.31

One-Time Charges	
Total One-Time Charges	\$41,217.89
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$41,217.89

Funding Request for FRN #1699130450

Funding Request Nickname: RC Tech - Santa Maria School

Service Type: Internal Connections

Agreement Information - Contract

Contract Number

Establishing FCC Form 470 160034928

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Award Date May 23, 2016

How many bids were received for this contract? 4

What is the service start date? July 01, 2016

Account Number

Service Provider RC Technology Services, Inc. (SPN: 143045321)

Based on State Master Contract? No

Based on a multiple award schedule? No

Includes Voluntary Extensions? No

Remaining Voluntary Extensions

Total Remaining Contract Length

What is the date your contract expires for the current term of the contract? September 30, 2017

Document Name	Document Description
10620 Santa Maria School - RCTech C2 Contract.pdf	Internal Connections

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative Access Points, Switches, Racks, UPS, Firewall, Cabling

Line Item # 1699130450.001

Product and Service Details

Type of Internal Connection Wireless Data Distribution Type of Product Access Point
Make Aerohive Networks Model AH-AP 230
Is installation included in Price? Yes Is the hardware for this FRN line item leased? No

Cost Calculation for FRN Line Item # 1699130450.001

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$0.00	One-time Unit Cost	\$900.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00	One-time Eligible Unit Cost	= \$900.00
Monthly Quantity	x 0	One-time Quantity	x 24
Units	0	Total Eligible One-time Costs	= \$21,600.00
Total Monthly Eligible Recurring Costs	= \$0.00	Summary	
Months of Service	x 12	Total Eligible Recurring Costs	\$0.00
Total Eligible Recurring Costs	= \$0.00	Total Eligible One-time Costs	+ \$21,600.00
		Pre-Discout Extended Eligible Line Item Cost	= \$21,600.00

Recipients of Services

BEN	Name	Amount
10620	SANTA MARIA SCHOOL	\$21,600.00

Line Item # 1699130450.002

Product and Service Details

Type of Internal Connection Data Distribution Type of Product Switch
Make Netgear Model GS728TP Switch
Is installation included in Price? Yes Is the hardware for this FRN line item leased? No

Cost Calculation for FRN Line Item # 1699130450.002

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$0.00	One-time Unit Cost	\$550.00

Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00
Monthly Quantity	x 0
Units	0
Total Monthly Eligible Recurring Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$550.00
One-time Quantity	x 3
Total Eligible One-time Costs	= \$1,650.00
Summary	
Total Eligible Recurring Costs	\$0.00
Total Eligible One-time Costs	+ \$1,650.00
Pre-Discout Extended Eligible Line Item Cost	= \$1,650.00

Recipients of Services

BEN	Name	Amount
10620	SANTA MARIA SCHOOL	\$1,650.00

Line Item # 1699130450.003

Product and Service Details

Type of Internal Connection	Racks	Type of Product	Racks & Cabinets
Make	Other	Model	Wall Mount Rack
Is installation included in Price?	Yes	Is the hardware for this FRN line item leased?	No

Cost Calculation for FRN Line Item # 1699130450.003

Monthly Cost	
Monthly Recurring Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00
Monthly Quantity	x 0
Units	0
Total Monthly Eligible Recurring Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Unit Cost	\$525.00
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$525.00
One-time Quantity	x 3
Total Eligible One-time Costs	= \$1,575.00
Summary	
Total Eligible Recurring Costs	\$0.00
Total Eligible One-time Costs	+ \$1,575.00
Pre-Discout Extended Eligible Line Item Cost	= \$1,575.00

Recipients of Services

BEN	Name	Amount
10620	SANTA MARIA SCHOOL	\$1,575.00

Line Item # 1699130450.004

Product and Service Details

Type of Internal Connection	Data Protection	Type of Product	UPS/ Battery Backup
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Make	American Power Conversion	Model	APC BE750TP UPS
Is installation included in Price?	Yes	Is the hardware for this FRN line item leased?	No

Cost Calculation for FRN Line Item # 1699130450.004

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$0.00	One-time Unit Cost	\$175.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00	One-time Eligible Unit Cost	= \$175.00
Monthly Quantity	x 0	One-time Quantity	x 3
Units	0	Total Eligible One-time Costs	= \$525.00
Total Monthly Eligible Recurring Costs	= \$0.00	Summary	
Months of Service	x 12	Total Eligible Recurring Costs	\$0.00
Total Eligible Recurring Costs	= \$0.00	Total Eligible One-time Costs	+ \$525.00
		Pre-Discout Extended Eligible Line Item Cost	= \$525.00

Recipients of Services

BEN	Name	Amount
10620	SANTA MARIA SCHOOL	\$525.00

Line Item # 1699130450.005

Product and Service Details

Type of Internal Connection	Data Protection	Type of Product	Firewall Services & Components
Make	Dell	Model	SonicWALL TZ300
Is installation included in Price?	Yes	Is the hardware for this FRN line item leased?	No

Cost Calculation for FRN Line Item # 1699130450.005

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$0.00	One-time Unit Cost	\$1,050.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00	One-time Eligible Unit Cost	= \$1,050.00
Monthly Quantity	x 0	One-time Quantity	x 1
Units	0	Total Eligible One-time Costs	= \$1,050.00
Total Monthly Eligible Recurring Costs	= \$0.00	Summary	
Months of Service	x 12	Total Eligible Recurring Costs	\$0.00
Total Eligible Recurring Costs	= \$0.00	Total Eligible One-time Costs	+ \$1,050.00
		Pre-Discout Extended Eligible Line Item Cost	= \$1,050.00

Recipients of Services

BEN	Name	Amount
10620	SANTA MARIA SCHOOL	\$1,050.00

Line Item # 1699130450.006

Product and Service Details

Type of Internal Connection	Cabling/Connectors	Type of Product	Cabling
Make	Other	Model	Cat6 Network Cable Runs
Is installation included in Price?	Yes	Is the hardware for this FRN line item leased?	No

Cost Calculation for FRN Line Item # 1699130450.006

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$0.00	One-time Unit Cost	\$520.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00	One-time Eligible Unit Cost	= \$520.00
Monthly Quantity	x 0	One-time Quantity	x 27
Units	0	Total Eligible One-time Costs	= \$14,040.00
Total Monthly Eligible Recurring Costs	= \$0.00	Summary	
Months of Service	x 12	Total Eligible Recurring Costs	\$0.00
Total Eligible Recurring Costs	= \$0.00	Total Eligible One-time Costs	+ \$14,040.00
		Pre-Discout Extended Eligible Line Item Cost	= \$14,040.00

Recipients of Services

BEN	Name	Amount
10620	SANTA MARIA SCHOOL	\$14,040.00

Line Item # 1699130450.007

Product and Service Details

Type of Internal Connection	Cabling/Connectors	Type of Product	Connectors
Make	Other	Model	Patch Panel
Is installation included in Price?	Yes	Is the hardware for this FRN line item leased?	No

Cost Calculation for FRN Line Item # 1699130450.007

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$0.00	One-time Unit Cost	\$270.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
		One-time Eligible Unit Cost	= \$270.00

Monthly Recurring Unit Eligible Costs	= \$0.00
Monthly Quantity	x 0
Units	0
Total Monthly Eligible Recurring Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-time Quantity	x 3
Total Eligible One-time Costs	= \$810.00
Summary	
Total Eligible Recurring Costs	\$0.00
Total Eligible One-time Costs	+ \$810.00
Pre-Discount Extended Eligible Line Item Cost	= \$810.00

Recipients of Services

BEN	Name	Amount
10620	SANTA MARIA SCHOOL	\$810.00

Line Item # 1699130450.008

Product and Service Details

Type of Internal Connection	Miscellaneous	Type of Product	Installation, Activation, & Initial Configuration
Make	Other	Model	Programming/Configuration
Is installation included in Price?No		Is the hardware for this FRN lineNo item leased?	

Cost Calculation for FRN Line Item # 1699130450.008

Monthly Cost	
Monthly Recurring Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00
Monthly Quantity	x 0
Units	0
Total Monthly Eligible Recurring Costs	= \$0.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$0.00

One-Time Cost	
One-time Unit Cost	\$3,200.00
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$3,200.00
One-time Quantity	x 1
Total Eligible One-time Costs	= \$3,200.00
Summary	
Total Eligible Recurring Costs	\$0.00
Total Eligible One-time Costs	+ \$3,200.00
Pre-Discount Extended Eligible Line Item Cost	= \$3,200.00

Recipients of Services

BEN	Name	Amount
10620	SANTA MARIA SCHOOL	\$3,200.00

Line Item # 1699130450.009

Product and Service Details

Type of Internal Connection	Cabling/Connectors	Type of Product	Connectors
Make	Other	Model	Wire Mold per 6ft

Is installation included in Price?Yes

Is the hardware for this FRN lineNo
item leased?

Cost Calculation for FRN Line Item # 1699130450.009

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$0.00	One-time Unit Cost	\$23.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$0.00	One-time Eligible Unit Cost	= \$23.00
Monthly Quantity	x 0	One-time Quantity	x 513
Units	0	Total Eligible One-time Costs	= \$11,799.00
Total Monthly Eligible Recurring Costs	= \$0.00	Summary	
Months of Service	x 12	Total Eligible Recurring Costs	\$0.00
Total Eligible Recurring Costs	= \$0.00	Total Eligible One-time Costs	+ \$11,799.00
		Pre-Discout Extended Eligible Line Item Cost	= \$11,799.00

Recipients of Services

BEN	Name	Amount
10620	SANTA MARIA SCHOOL	\$11,799.00

FRN Calculation for FRN #1699130450

Monthly Charges		Total Requested Amount	
Total Monthly Recurring Charges	\$0.00	Total Eligible Pre-Discout Recurring Charges	\$0.00
Total Monthly Ineligible Charges	- \$0.00	Total Eligible Pre-Discout One-Time Charges	+ \$56,249.00
Total Monthly Eligible Charges	= \$0.00	Total Pre-Discout Charges	= \$56,249.00
Total Number of Months of Service	x 12	Discount Rate	80%
Total Eligible Pre-Discout Recurring Charges	= \$0.00	Funding Commitment Request	= \$44,999.20

One-Time Charges	
Total One-Time Charges	\$56,249.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discout One-Time Charges	= \$56,249.00

Connectivity Questions

Per Entity Basis Questions

Entity Name		CATHOLIC SCHOOL REGION OF NORTHEAST & EAST BRONX				Entity Number		17000730	
BEN	Entity Name	Download	Units	Upload	Units	Connection	Wifi Sufficient	Barriers to Robust Network	
10676	NATIVITY OF BLESSED LADY SCH	101.00	Mbps	35.00	Mbps	Cable Modem	Completely	No barriers	

BEN	Entity Name	Download	Units	Upload	Units	Connection	Wifi Sufficient	Barriers to Robust Network
10671	OUR LADY OF GRACE SCHOOL	101.00	Mbps	35.00	Mbps	Cable Modem	Completely	No barriers
10620	SANTA MARIA SCHOOL	101.00	Mbps	35.00	Mbps	Cable Modem	Completely	No barriers
10715	SS PHILIP AND JAMES SCHOOL	150.00	Mbps	150.00	Mbps	Cable Modem	Completely	No barriers
10652	ST BENEDICT SCHOOL	101.00	Mbps	35.00	Mbps	Cable Modem	Completely	No barriers
10594	ST CLARE'S SCHOOL	101.00	Mbps	35.00	Mbps	Cable Modem	Completely	No barriers
10660	ST FRANCIS ASSISI SCHOOL	101.00	Mbps	35.00	Mbps	Cable Modem	Completely	No barriers
10595	ST FRANCIS XAVIER SCHOOL	101.00	Mbps	35.00	Mbps	Cable Modem	Completely	No barriers
10668	ST MARY SCHOOL	202.00	Mbps	70.00	Mbps	Cable Modem	Completely	No barriers
10696	ST LUCY'S SCHOOL	101.00	Mbps	35.00	Mbps	Cable Modem	Completely	No barriers
10658	ST FRANCES DE CHANTAL SCHOOL	150.00	Mbps	150.00	Mbps	Cable Modem	Completely	No barriers
10757	HOLY FAMILY SCHOOL	1.50	Mbps	1.50	Mbps	Other	Completely	No barriers
10691	IMMACULATE CONCEPTION G SCHOOL	101.00	Mbps	35.00	Mbps	Cable Modem	Completely	No barriers
10725	HOLY ROSARY SCHOOL	101.00	Mbps	35.00	Mbps	Cable Modem	Completely	No barriers

Certifications

I certify that the entities listed in this application are eligible for support because they are schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million.

I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

Total Funding Summary

Below is a summary of the total line item costs on this FCC Form 471:

Summary	
Total funding year pre-discount eligible amount on this FCC Form 471	\$138,684.78
Total funding commitment request amount on this FCC Form 471	\$110,947.82
Total applicant non-discount share of the eligible amount	\$27,736.96
Total budgeted amount allocated to resources not eligible for E-rate support	\$56,000.00
Total amount necessary for the applicant to pay the non-discount share of eligible and any ineligible amounts	\$83,736.96
Are you receiving any of the funds directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year?	No
Has a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds needed to pay your non-discounted share?	No

I certify an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology goals.

I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.

I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. § 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, as prohibited by the Commission's rules at 47 C.F.R. § 54.503(d), other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification) after the later of the last day of the applicable funding year or the service delivery deadline for the associated funding request. I acknowledge that I may be audited pursuant to participation in the schools and libraries program. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to USAC.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504.

Notice

Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to submit an application for such discounts by filing this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the application requirements for universal service discounts contained in 47 C.F.R. § 54.504. Schools and libraries must file this form themselves or as part of a consortium. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving your application for universal service discounts is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application for universal service discounts may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public. If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized. If you do not provide the information we request on the form, the FCC or the Universal Service Administrator may delay processing of your application for universal service discounts or may return your application without action. The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq. Public reporting burden for this collection of information is estimated to average 4.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554. We also will accept your comments via the email if you send them to PRA@FCC.gov. DO NOT SEND COMPLETED WORKSHEETS TO THESE ADDRESSES.

Authorized Person

Title:	Director of Marketing	Name:	Donald Meissner
Phone:	314-480-6370	Email:	dmeissner@erateprogram.com
Address:	9666 Olive Blvd Suite 215 St. Louis MO 63132	Employer:	Donald Meissner

Certified Timestamp

26-May-2016 14:47:24 EDT

EXHIBIT 2

INVOICE

Invoice Number
133549
Invoice Date
11/08/17



290 Lodi Street
Hackensack, NJ 07601
515 Jefferson Boulevard
Staten Island, NY 10312
201.498.0203

Sold To:	Reference: Job No. 17-536
Santa Maria 1510 Zerega Avenue Bronx, NY 10462	1510 Zerega Avenue Bronx, NY 10462

Customer ID	Customer Reference		Payment Terms
3216			Net 30 Days
Vendor ID	Shipping Method	Ship Date	Due Date
	US Mail		12/08/17

Qty	Description	Unit Price	Extended Price
	For work performed at Santa Maria School located in the Bronx. Please reference RC Technology Quote # 16-1001 for additional information		
	24 - WAPS		\$ 21,600.00
	3 - Switches		\$ 1,650.00
	3 - Racks		\$ 1,575.00
	1 - UPS		\$ 525.00
	1 - Firewall		\$ 1,050.00
	27 - Cat6 Cable Runs		\$ 14,040.00
	3 - Patch Panel		\$ 810.00
	Programming		\$ 3,200.00
	513 - Wire Mold per 6 ft.		\$ 11,799.00
	Router (included with firewall) - N/C		
	Wireless Controller (cloud base included) - N/C		
	E-Rate Obligation		\$ (44,999.20)
		Subtotal:	\$ 11,249.80
		Tax	\$ 0.00
		Total:	\$ 11,249.80

EXHIBIT 3

821178

**CATHOLIC SCHOOL REGION OF
NORTHEAST/EAST BRONX**
REGIONAL OPERATING ACCOUNT
1011 1ST AVENUE
NEW YORK, NY 10022

JPMORGAN CHASE BANK, N.A.
WWW.CHASE.COM
1-21210

03/14/2018

PAY TO THE
ORDER OF

RC Technology Services, Inc.

\$

11,249.80

Eleven Thousand Two Hundred Forty-Nine Dollars and Eighty Cents

DOLLARS

RC Technology Services, Inc.
290 Lodi Street
Hackensack, NJ 07601

MEMO

3216

⑈ ⑆ 2 1 1 7 8 ⑆ ⑆ 0 2 1 0 0 0 0 2 1 ⑆

2 5 1 3 1 0 6 1 7 ⑆

AUTHORIZED SIGNATURE



CATHOLIC SCHOOL REGION OF NORTHEAST/EAST BRONX

821178

Bill #	Invoice #	Invoice Date	Comment	Amount
32340	133549	11/8/2017	Technology/Wireless	11,249.80
	Check # 821178		Check Date: 3/14/2018	11,249.80

Pay To: 8265 RC Technology Services, Inc., 290 Lodi Street, Hackensack, NJ 07601
Account Number: 3216

EXHIBIT 4

FCC Form 474

Do not write in this space.

Approved by OMB
OMB Control No. 3060 – 0856
Estimated time per response: 1.0 hour

**Schools and Libraries Universal Service
Service Provider Invoice FCC Form 474**

Please read instructions before completing

Service Provider Form Identifier 17-536 Santa
Maria Bronx
(Create an identifier for your own reference)

FCC Form 474 Invoice # 2796447
(To be inserted by administrator)

Block 1: Service Provider Information

1. Service Provider Name		RC TECHNOLOGY	
2. Service Provider Identification Number (SPIN)		143045321	
3. Contact Person's Name		Nancy Fulton	
4. Contact Telephone Number	Area Code: 201	Phone Number:	4980005 Ext. 244
Contact Fax Number	Area Code: 201	Fax Number:	4980006
Contact Email Address		nancy@rctechcorp.com	
5. Total Invoice Amount (total of Block 2, Column 13) 44999.20			

SPIN <u>143045321</u>							
Service Provider Form Identifier <u>17-536 Santa Maria Bronx</u>							
Contact Person <u>Nancy Fulton</u>							
Contact Telephone Number <u>201-4980005 244</u>							
Block 2: Funding Request Number Information							
6. FCC Form 471 Application Number (from Funding Commitment Decision Letter)	7. Funding Request Number (FRN) (from Funding Commitment Decision Letter)	8. Bill Frequency (e.g., Monthly, Quarterly, Annually, One-time, Other)	9. Customer Billed Date (mm/yyyy)	10. Shipping Date to Customer or Last Day of Work Performed (mm/dd/yyyy)	11. Total (Undiscounted) Amount for Service per FRN	12. Discount Rate	13. Amount Billed to USAC (Column 11 multiplied by Column 12)
			For each FRN, there should be an entry in Column 9 or Column 10 but NOT BOTH				
161056131	1699130450	ONE-TIME	11/01/2017		56249	80	44999.20
TOTAL REIMBURSEMENT AMOUNT TO BE ENTERED INTO ITEM 5							

Service Provider Invoice FCC Form 474**Service Provider Form Identifier** 17-536 Santa Maria Bronx**Contact Person** Nancy Fulton**Contact Telephone Number** 201-4980005 244**Block 3: Service Provider Certifications & Signature**

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Service Provider Invoice Form (FCC Form 474) and acknowledge to the best of my knowledge, information and belief, as follows:

- ✓ A. I certify that this Service Provider is in compliance with the rules and orders governing the schools and libraries universal service support program and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments.
- ✓ B. I certify that the certifications made on the Service Provider Annual Certification Form (FCC Form 473) by this Service Provider are true and correct.
- ✓ C. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

14. Signature of authorized person ✓**15. Date** 4/5/2018**16. Printed name of authorized person**
Nancy Fulton**17. Title or position of authorized person**
Accounting**18. Telephone number of authorized person**
201-2886379**19. Address of authorized person**
290 Lodi Street
Hackensack NJ, 07601

Approved by OMB
OMB Control NO. 3060 – 0856

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to range from 1 to 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERF, Paperwork Reduction Act Project (3060-0856), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0856.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Do not staple the FCC Form 474.

[Home](#) | Client Service Bureau: 1-888-203-8100

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EXHIBIT 5

#257485

REOPEN CASE

Summary News Related Actions

Case Details

Topic	FCC Form 474 - SPI - Other	Form Type	FCC Form 474
Status	Closed	Form Number	2796447
Priority	Medium	Created By	USAC
Inquiry Type	Phone	Created On	12/6/2018 10:30 AM EST
		Organization	RC Technology Services, Inc.

Case Description

Description /Confirm SSD & IDD for FRN 1699130450

Case Artifacts

Documents			Attachments	
Name	Uploaded By	Upload Date	Attachment	Attachment Type
No items available			No items available	

Case Thread

User	Note	Date
	<p>For FRN 1699130450: I was not able to find a related appeal nor a Form 500 request to extend the service delivery or invoicing deadlines.</p> <ul style="list-style-type: none">- Service Start Date - 7/1/2016- Contract Expiration Date - 9/30/2017 ✓- Service Delivery Deadline - 9/30/2017 ✓- Invoice Deadline Date - 5/29/2018 -	
USAC	<p>For invoice # 2796447; submitted 4/5/2018: The customer billed date was listed as 11/01/2017. This was after the service delivery deadline date, so the request was rejected on 4/9/2018. At this point there is nothing to be done unless the applicant is somehow able to get an extension for both the service delivery and invoice deadline dates.</p>	12/6/2018 2:43 PM EST

Case Contact

Case Contact Nancy Fulton

EXHIBIT 6

Revised Funding Commitment Decision Letter

Funding Year 2016

Contact Information:

Donald Meissner
CATHOLIC SCHOOL REGION OF NORTHEAST &
EAST BRONX
2962 HARDING AVENUE
SUITE 401
SUITE 401, NY 10465
dmeissner@erateprogram.com

BEN: 17000730**Post Commitment Wave:** 74

Totals

Original Commitment Amount	\$44,999.20
Revised Commitment Amount	\$44,999.20

What is in this letter?

Thank you for submitting your post-commitment request for Funding Year 2016 Schools and Libraries Program (E-rate) funding. Attached to this letter, you will find the revised funding statuses and/or post commitment changes to the original Funding Commitment Decision Letter (FCDL) you received. Below are the changes that were made:

- FCC Form 500 - Contract Expiration Date Change

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

Next Steps

1. **File the FCC Form 486**, Service Confirmation and Children's Internet Protection Act (CIPA) Certification Form, for any FRNs included in this RFCDL, if you have not already done so. Please review the CIPA requirements and file the form(s).



BEN Name: CATHOLIC SCHOOL REGION OF NORTHEAST & EAST BRONX

BEN: 17000730

Post Commitment Wave: 74

- o **If USAC approved funding on an FRN in your original FCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of the original FCDL or from the service start date (whichever is later).
 - o **If a new FRN was created for this RFCDL or funding was not approved on an FRN in your original FCDL but is approved in this RFCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of this RFCDL or from the service start date (whichever is later).
2. **Invoice USAC**, if you or your service provider have not already done so. Work with your service provider(s) to determine if your bills will be discounted or if you will request reimbursement from USAC after paying your bills in full.
- **If you (the applicant) are invoicing USAC:** You must pay your service provider(s) the full cost for the services you receive and file the [FCC Form 472](#), the Billed Entity Applicant Reimbursement (BEAR) Form, to invoice USAC for reimbursement of the discounted amount.
 - **If your service provider(s) is invoicing USAC:** The service provider(s) must provide services, bill the applicant for the non-discounted share, and file the [FCC Form 474](#), the Service Provider Invoice (SPI) form, to invoice USAC for reimbursement for the discounted portion of costs. Every funding year, service providers must file an [FCC Form 473](#), the Service Provider Annual Certification Form, to be able to submit invoices and to receive disbursements.
 - **To receive an invoice deadline extension, the applicant or service provider** must request an extension on or before the last date to invoice. **If you anticipate, for any reason, that invoices cannot be filed on time**, USAC will grant a one-time, 120-day invoice deadline extension if timely requested.

How to Appeal or Request a Waiver of a Decision

You can appeal or request a waiver of a decision in this letter **within 60 calendar days** of the date of this letter. Failure to meet this deadline will result in an automatic dismissal of your appeal or waiver request.

Note: The Federal Communications Commission (FCC) will not accept appeals of USAC decisions that have not first been appealed to USAC. However, if you are seeking a waiver of E-rate program rules, you must submit your request to the FCC and not to USAC. USAC is not able to waive the E-rate program rules.

- **To submit your appeal to USAC**, visit the Appeals section in the [E-rate Productivity Center \(EPC\)](#) and provide the required information. USAC will reply to your appeal submissions to confirm receipt. Visit USAC's [website](#) for additional information on submitting an appeal to USAC, including step-by-step instructions.
- **To request a waiver of the FCC's rules or appeal USAC's appeal decision**, please submit it to the FCC in proceeding number CC Docket No. 02-6 using the [Electronic Comment Filing System](#) (ECFS). Include your contact information, a statement that your filing is a waiver request,



BEN Name: CATHOLIC SCHOOL REGION OF NORTHEAST & EAST BRONX

BEN: 17000730

Post Commitment Wave: 74

identifying information, the FCC rule(s) for which you are seeking a waiver, a full description of the relevant facts that you believe support your waiver request and any related relief, and any supporting documentation.

For appeals to USAC or to the FCC, be sure to keep a copy of your entire appeal, including any correspondence and documentation, and provide a copy to the affected service provider(s).

Obligation to Pay Non-Discount Portion

Applicants are required to pay the non-discount portion of the cost of the eligible products and/or services to their service providers. Service providers are required to bill applicants for the non-discount portion of costs for the eligible products and/or services. The FCC stated that requiring applicants to pay the non-discounted share of costs ensures efficiency and accountability in the program. If using the BEAR invoicing method, the applicant must pay the service provider in full (the non-discount plus discount portion) **before** seeking reimbursement from USAC. If using the SPI invoicing method, the service provider must first bill the applicant **before** invoicing USAC.

Notice on Rules and Funds Availability

The applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program and the FCC's rules. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.



BEN Name: CATHOLIC SCHOOL REGION OF NORTHEAST & EAST BRONX

BEN: 17000730

Post Commitment Wave: 74

Revised Funding Commitment Decision Overview

Funding Year 2016

Funding Request Number (FRN)	Service Provider Name	Request Type	Revised Committed	Review Status
1699130450	RC Technology Services, Inc.	FCC Form 500 - Contract Expiration Date Change	\$44,999.20	Approved



BEN Name: CATHOLIC SCHOOL REGION OF NORTHEAST & EAST BRONX

BEN: 17000730

Post Commitment Wave: 74

Post Commitment Request Number: 131385	Post Commitment Request Type: FCC Form 500 - Contract Expiration Date Change	Post Commitment Decision: Approved
--	---	--

FRN: 1699130450	Service Type: Internal Connections	Original Status: Funded	Revised Status: Funded
FCC Form 471: 161056131			

Dollars Committed			
Monthly Cost		One-Time Cost	
Months of Service	12		
Total Eligible Recurring Charges	\$0.00	Total Eligible One Time Charges	\$56,249.00
Total Pre-Discount Charges		\$56,249.00	
Discount Rate		80.00%	
Revised Committed Amount		\$44,999.20	

Dates	
Service Start Date	7/1/2016
Contract Expiration Date	4/30/2019
Contract Award Date	5/23/2016
Service Delivery Deadline	9/30/2017
Expiration Date (All Extensions)	

Service Provider and Contract Information	
Service Provider	RC Technology Services, Inc.
SPIN (498ID)	143045321
Contract Number	
Account Number	
Establishing FCC Form 470	160034928

Consultant Information	
Consultant Name	Richard A Senturia
Consultant's Employer	ERateProgram, LLC
CRN	16048902

Revised Funding Commitment Decision Comments:
--

Post Commitment Rationale:

The Contract Expiration Date Change requests for FRN #1699130450 has been approved and your FRN was modified.

EXHIBIT 7

IMPORTANT

Please record this invoice's information in a secure place for future records

InvoiceID: 2898008
Security Code: 53486

[Continue>>](#)

[Home](#) | Client Service Bureau: 1-888-203-8100

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Do not write in this space.

Approved by OMB
OMB Control No. 3060 – 0856
Estimated time per response: 1.0 hour**Schools and Libraries Universal Service
Service Provider Invoice FCC Form 474**

Please read instructions before completing

Service Provider Form Identifier 17-536 Santa

Maria

(Create an identifier for your own reference)

FCC Form 474 Invoice # 2898008

(To be inserted by administrator)

Block 1: Service Provider Information**1. Service Provider Name** RC TEHCNOLOGIES INC**2. Service Provider Identification Number (SPIN)** 143045321**3. Contact Person's Name** Nancy Fulton**4. Contact Telephone Number** Area Code: 201 Phone Number: 4980005 Ext. 244

Contact Fax Number Area Code: 201 Fax Number: 4980006

Contact Email Address nancy@rctechcorp.com

5. Total Invoice Amount (total of Block 2, Column 13) 44999.20

SPIN <u>143045321</u>
Service Provider Form Identifier <u>17-536 Santa Maria</u>
Contact Person <u>Nancy Fulton</u>
Contact Telephone Number <u>201-4980005 244</u>

Block 2: Funding Request Number Information

6. FCC Form 471 Application Number (from Funding Commitment Decision Letter)	7. Funding Request Number (FRN) (from Funding Commitment Decision Letter)	8. Bill Frequency (e.g., Monthly, Quarterly, Annually, One-time, Other)	9. Customer Billed Date (mm/yyyy)	10. Shipping Date to Customer or Last Day of Work Performed (mm/dd/yyyy)	11. Total (Undiscounted) Amount for Service per FRN	12. Discount Rate	13. Amount Billed to USAC (Column 11 multiplied by Column 12)
			For each FRN, there should be an entry in Column 9 or Column 10 but NOT BOTH				
161056131	1699130450	ONE-TIME	11/01/2017		56249	80	44999.20

TOTAL REIMBURSEMENT AMOUNT TO BE ENTERED INTO ITEM 5

Service Provider Invoice FCC Form 474

Service Provider Form Identifier 17-536 Santa Maria

Contact Person Nancy Fulton

Contact Telephone Number 201-4980005 244

Block 3: Service Provider Certifications & Signature

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Service Provider Invoice Form (FCC Form 474) and acknowledge to the best of my knowledge, information and belief, as follows:

- ☒ A. I certify that this Service Provider is in compliance with the rules and orders governing the schools and libraries universal service support program and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments.
- ☒ B. I certify that the certifications made on the Service Provider Annual Certification Form (FCC Form 473) by this Service Provider are true and correct.
- ☒ C. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

14. Signature of authorized person ☒

15. Date 1/4/2019

16. Printed name of authorized person
Nancy Fulton

17. Title or position of authorized person
Accounts Payable

18. Telephone number of authorized person
201-4980005

19. Address of authorized person
290 Lodi Street
Hackensack NJ, 07601

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to range from 1 to 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Act Project (3060-0856), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0856.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Do not staple the FCC Form 474.

[Home](#) | Client Service Bureau: 1-888-203-8100

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EXHIBIT 8

143045321|RC Technology Services,
Inc.|rich@rctechcorp.com|usacstatement@universalservice.org|3|\$5,126.00|S
chools And Libraries|As of January 08, 2019
SPI|143045321|18-523 St Mary Fishkill|1699127238|"SLD Invoice
Number:2897979;Line Item Detail Number:9447519;Amount
Requested:14423.60;Bill Date> [90] days 471 Term or Cnt Ext;36;Billed
Date After Contract Expiration Date;224;"|062017|\$0.00
SPI|143045321|18-535 St Patrick School|1799058162|"SLD Invoice
Number:2897983;Line Item Detail Number:9447526;Amount
Requested:5126.00;"|062018|\$5,126.00
SPI|143045321|17-536 Santa Maria|1699130450|"SLD Invoice
Number:2898008;Line Item Detail Number:9447529;Amount
Requested:44999.20;Invoice Received Date [01/04/2019] Later Than FCC
Extension Date [05/29/2018];80;Bill Date [11/01/2017] > [09/30/2017]
Billed Extension Date; one time cost;81;Billed Date Outside of Funding
Year;285;"|062017|\$0.00

Your Total Actual Disbursement: \$5,126.00.

EXHIBIT 9

Detailed explanations of the error codes used to identify erroneous or improperly formatted invoice line item(s) on your USAC remittance statement are shown below for your reference.

Note: A Service Provider Identification Number (SPIN) is also known as the [service provider's 498 ID](#).

Invoice Line Item Error Code	Error Description On the USAC Remittance Detail Report	Error Description Detail
12	Invoice Rec'd Date Invalid For Funding Yr.	The date that the invoice was received by USAC is later than mm/dd/yyyy established by the Federal Communications Commission as the last date to process invoices for the funding year
16	471 Application Number Not Provided	The FCC Form 471 Application Number, SPI Column 8, has not been provided
17	471 Application # [xxxx...x] Not Found	The FCC Form 471 Application Number, SPI Column 8, is not a valid application number
18	471 Certification Not Received	The FCC Form 471 application Certifications and Signatures, Block 6, has not been received from the applicant
19	471 Application Not Approved	The FCC Form 471 application has not been approved by USAC
20	FRN Funding Commitment Not As Yet Made	SPI received for an FRN, SPI Column 9, but funding has not been committed by USAC
22	FRN Not Provided	The FRN, SPI Column 9, has not been provided
23	Invalid 471 [xxxx...x] / FRN [xxxxx...x]	The FRN, SPI Column 9, does not exist for the FCC Form 471 Application Number, SPI Column 8, that has been provided (Compare with the FRN and FCC Form 471 Application Number detailed in the FCDL)
24	Invalid SPIN [xxxx...x] / FRN [xxxx...x]	The SPIN, SPI Item 2, is not valid for FRN, SPI Column 9 that is provided (Compare with the FRN and SPIN detailed in the FCDL)
25	FRN Not Approved	The FRN, SPI Column 9, provided in the FCC Form 471 application has not been approved
28	No FCC Form 486 Filed or FCC Form 486 Missing Start Date	No FCC Form 486 Receipt of Service Confirmation received for the FRN or the FCC Form 486 on file is missing the Actual Service Start Date, FCC Form 486, Block 2, Column E
31	Bill Frequency Not Provided or In Error	Bill frequency (monthly, quarterly, annually, one-time, other), SPI Column 10, was blank or contained erroneous data
32	Billed Date Later Than Invoice Date	The Customer Billed Date, SPI Column 11, or the Shipping Date to Customer or Last Day of Work Performed, Column 12, provided is later than the Invoice Date to USAC, SPI Item 6 (Services under the program may not be billed to USAC in advance. USAC invoicing may occur only after services have been rendered. For example, a SPI with an Invoice Date to USAC of June 1, 2000 must have a Customer Billed Date or Shipping Date to Customer or Last Day of Work Performed with a date prior to June 1, 2000.)
40	Neither 'Billed Date' or 'Shipped Date' Provided	Either the Customer Billed Date, SPI Column 11, OR the Shipping Date to Customer or Last Day of Work Performed, Column 12, must be populated
41	Both 'Billed Date' & 'Shipping Date' Provided	Only the Customer Billed Date, SPI Column 11, or the Shipping Date to Customer or Last Day of Work Performed, Column 12, may be populated, but not both (Customer Billed Date should be used for recurring services, and Shipping Date to Customer or Last Day of Work Performed should be used for non-recurring or one-time services)
42	Total Undisc'd. Amt. Svc./FRN' Missing	The Total (Undiscounted) Amount for Service per FRN, SPI Column 13, is not provided.

44	Discount Amt. Billed To USAC Blank or Zero	Discount Amount Billed to USAC, SPI Column 14, has not been provided
48	Discount Amt. Billed Not Valid	The Discount Amount Billed To USAC, SPI Column 14, is greater than the product of Total (Undiscounted) Amount for Service, SPI Column 13, x USAC approved discount percent (A higher level of discount percent than the USAC approved discount percent for the FRN may have been used to calculate the Discount Amount Billed To USAC. The correct applicant approved discount percent for the FRN may be found in the FCDL.)
60	Service Provider Not Certified	SPIN, SPI Item 2, provided has not filed an FCC Form 473 (Service Provider Annual Certification)
80	Invoice Received Date Later Than FCC Extension	The date that the invoice was received by USAC is later than mm/dd/yyyy established by the FCC as the last date to process invoices for specific funding year service delivery extensions due to FCC policy rulings and appeals
83	FRN [xxxx...x]/SPIN [xxxx...x] May Be Invoiced only through BEARs	The invoice form, i.e. Service Provider Invoice (SPI) or Billed Entity Applicant Reimbursement (BEAR), for the FRN is different from the type of invoice form that was submitted as the first invoice for the funding year. The type of invoice form (BEAR or SPI) for an FRN may not change from the invoice form that was submitted as the first invoice for the funding year. The type of invoice form (BEAR or SPI) for the funding year is established by the receipt and approval of the first invoice submitted for the FRN for the funding year.

EXHIBIT 10



Universal Service
Administrative Co.

Schools and Libraries Program News Brief

January 4, 2019

TIP OF THE WEEK: Applicants and service providers, please review the list below for important dates and deadlines that occur in the first quarter of calendar 2019. Start now to collect the documentation and make any other preparations you need to meet the deadlines that apply to you.

Upcoming Dates and Deadlines for the First Quarter of 2019

January 15, 2019 at 11:59 p.m. EST

E-rate Productivity Center (EPC) administrative window closes.

- *After this date, applicants will no longer be able to update certain information directly in their EPC profiles. Applicants who miss this deadline will still be able to submit requests for updates through a Receipt Acknowledgment Letter (RAL) modification in EPC, and those requests will be included in the review of their applications.*

January 16, 2019 at noon EST

The FY2019 application filing window opens.

- *Applicants will be able to access and certify an FCC Form 471 for FY2019.*

January 28, 2019 at 11:59 p.m. EST

Deadline to certify an invoice for FY2017 non-recurring services.

- *After this date, applicants and service providers cannot certify invoices for these services without an approved invoice deadline extension request or an approved waiver request of the invoice deadline from the FCC.*

Deadline to request an invoice deadline extension for FY2017 non-recurring services.

- *After this date, applicants and service providers cannot certify invoices for these services without an approved waiver request of the invoice deadline from the FCC.*

February 26, 2019 at 11:59 p.m. EST

Deadline to certify an invoice for FY2017 recurring services if the applicant or service provider requested and received an extension of the October 29, 2018 deadline.

- *After this date, applicants and service providers cannot certify invoices for these services without an approved waiver request of this deadline from the FCC.*

February 27, 2019 at 11:59 p.m. EST

Deadline to certify an FY2019 FCC Form 470 and still be able to meet the required 28-day waiting period for the competitive bidding process.

- *If the FCC Form 470 is certified after this date, the applicant's FCC Form 471 must be certified after the application filing window closes, and will not be considered for funding unless the applicant receives approval for a waiver request of the application filing window deadline from the FCC.*

March 27, 2019 at 11:59 p.m. EDT

The FY2019 application filing window closes.

- *An FCC Form 471 certified after this date will not be considered for funding unless the applicant receives an approval for a waiver request of the application filing window deadline from the FCC.*

Commitments for Funding Year 2018

Funding Year 2018. USAC released FY2018 Wave 38 Funding Commitment Decision Letters (FCDLs) on December 27 and Wave 39 FCDLs on January 3. As of January 4, FY2018 commitments total over \$2.02 billion.

On the date that FCDLs are issued, you can access your FCDL notification from the **Notifications** section of your landing page in the E-rate Productivity Center (EPC).

Service Providers: FY2019 Now Available for FCC Form 473

The drop-down menu for the FCC Form 473, Service Provider Annual Certification (SPAC) Form, now includes the option for FY2019. To file this form – which must be on file each year for every service provider who participates in the E-rate Program – service providers can log in to the [E-File System](#), go to the SPAC Form, and choose "2019" from the drop-down menu.

As a reminder, service providers with more than one Service Provider Identification Number (SPIN) must file a separate form for each SPIN.

Applicants and service providers can verify that this form has been successfully processed using either of these tools on the USAC website:

[SPIN Search Tool](#)

- Enter the first few characters of the service provider's name followed by a percent sign (%), or enter the service provider's nine-digit SPIN.
- Enter the number of search results you want (default is 10, maximum is 99).
- Click the **Next** button. Your results will appear on the following page.
- Locate your service provider's name and SPIN. In the right-hand column labeled "SPAC Filed," you will find all of the funding years with a SPAC Form on file for that SPIN.

[Service Provider Download Tool](#)

- Provide entries in one or more of the search criteria fields (service provider name, SPIN, status, city, state, and/or zip).
- Click the **Search** button. Your results will appear at the bottom of the page.
- In the right-hand column labeled "SPAC Filed (FCC Form 473)," you will find all of the funding years with a SPAC Form on file for that SPIN.